

EXHIBIT A

**UNITED STATES DISCRIT COURT
SOUTHERN DISTRICT OF NEW YORK**

PROJECT VERITAS and PROJECT
VERITAS ACTION FUND,

Plaintiffs/Counter-Defendants,

v.

JAMES O'KEEFE and TRANSPARENCY
1, LLC d/b/a O'KEEFE MEDIA GROUP,

Defendants/Counterclaimants.

Civil Action No. 7:23-cv-04533

**DECLARATION OF NICHOLAS P. WHITNEY
IN SUPPORT OF COUNTERCLAIMANTS O'KEEFE'S AND OMG'S
MOTION FOR ORDER AUTHORIZING ALTERNATIVE SERVICE
OF SUBPOENA FOR THIRD PARTY THOMAS O'HARA [ECF NO. 178]**

I, NICHOLAS P. WHITNEY, hereby depose and declare:

1. I am over 18 years of age and otherwise competent to make this declaration.
2. I have personal knowledge of all matters testified to herein.
3. I am a licensed attorney practicing in the State of Florida and was admitted to practice pro hac vice in this case on July 24, 2024 [Doc. 57].
4. Our firm has unsuccessfully attempted to serve former Chief Financial Officer of Project Veritas, Thomas O'Hara ("Mr. O'Hara") since October 2024.
5. First, we attempted to serve Mr. O'Hara at a Bear, Delaware address, which we concluded was the best address result for Mr. O'Hara after conducting a PeopleMap background search for Mr. O'Hara, based then on our limited information about Mr. O'Hara and the limited discovery exchanged in the case as of October 2024.

6. The initial process server's attempt at the Bear, Delaware address in October 2024 for a deposition scheduled on November 14, 2024 [ECF No. 178-1], was unsuccessful, and we lost contact with the process server. We were not provided with an Affidavit of Non-Service. The process server reportedly tried to serve Mr. O'Hara multiple times.

7. Not long after our first attempt to serve Mr. O'Hara, Plaintiffs' counsel filed a Motion to Withdraw [ECF Nos. 110-115] in December 2024, which was granted by the Court in January 2025. In connection with this withdrawal, discovery was held in abeyance until further Court Order [ECF No. 128].

8. In late February, Project Veritas and Project Veritas Action Fund filed an Appearance of Counsel [ECF No. 133] for their current counsel, Michael Harris, Esq. (Mr. Harris"), and discovery resumed.

9. I coordinated a new deposition date with Mr. Harris for Mr. O'Hara on April 30, 2025 [ECF No. 178-2] and attempted to serve Mr. O'Hara again in April at the Bear, Delaware address. The process server unsuccessfully attempted to serve Mr. O'Hara three (3) times. (See Non-Service Affidavit attached as **Exhibit 1**).

10. Then, through a review of thousands of pages of documents produced in discovery, Mr. O'Hara's resume surfaced as an attachment to an internal Project Veritas email on September 13, 2023, from Matthew Tyrmand (a deponent who we've also had to request an order from the Court to serve by alternative means) to John Garvey (recently deposed) stating "[w]ith the ongoing demise of Project Veritas . . . there is a plethora of journalistic and conservative movement talent hitting the market. I have compiled resumes together of those I have worked with that are superlative in their skills, dedication, ethics, and all around [sic] value add that I know would do amazing things with and for your respective organizations. I urge you to take a look at their resumes and distribute them widely and I am of course available to answer questions

about individual candidates, those that might work well together, skill sets, and those that might fill gaps in your respective orgs.” (See email attached as **Exhibit 2**). Thomas O’Hara’s resume attached to the September 2023 internal Project Veritas email had a Pawling, New York address and a personal email address. (See resume attached as **Exhibit 3**).

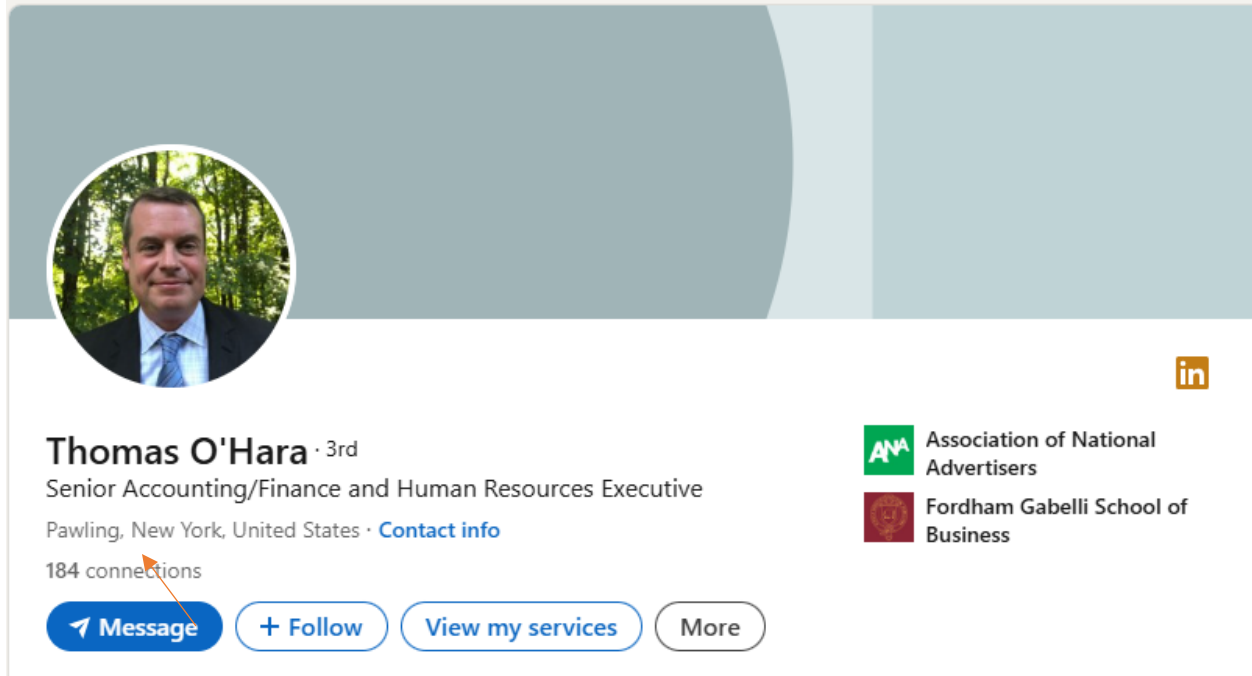
11. Working with Mr. Harris, I coordinated another deposition date for Mr. O’Hara on June 26, 2025 [ECF No. 178-4]. Since the contact information on a resume is typically accurate for the communication of potential job opportunities, we used the Pawling, New York address for three (3) additional attempts to serve a Subpoena for a June 2025 deposition on Mr. O’Hara. (See Non-Service Affidavit attached as **Exhibit 4**).

3. Prior to service attempts at the Pawling, New York address, we verified that Mr. O’Hara is a property owner at the Pawling, New York address on the resume. Mr. O’Hara’s property ownership at the Pawling address was established by researching that the Town and Village of Pawling, New York is located in Dutchess County, New York. An address search on the Dutchess County Real Property Tax Service Agency website¹ confirmed Mr. O’Hara was listed as a property owner at the Pawling, New York address prior to our service attempts and as recently as July 1, 2025. (See property search attached hereto as **Exhibit 5**).

4. After discovering a Pawling, New York address for Mr. O’Hara, we also conducted a LinkedIn search for Thomas O’Hara and Pawling, New York. The LinkedIn search resulted in the profile below²:

¹ <https://gis.dutchessny.gov/addressinfofinder/report/?id=7397>

² <https://www.linkedin.com/in/thomas-o-hara-1a7b90260/>



5. Our client, James O'Keefe, confirmed that the LinkedIn profile picture was that of Mr. O'Hara, former Chief Financial Officer of Project Veritas, noting that the profile indicates Mr. O'Hara's location is in Pawling, New York and the employment history matches that of the time frame and job description of his employment with Project Veritas, as well as the employment information provided on Mr. O'Hara's resume.

6. Mr. O'Hara's LinkedIn profile also indicates his current employer is The Association of National Advertisers ("ANA"). A search of ANA's website shows a NY phone number and email address for Mr. O'Hara³. The New York City address for ANA was used to attempt service of a Subpoena on Mr. O'Hara two (2) additional times. The process server was not granted entry for any further attempts at service of the Subpoena. (See Non-Service Affidavit attached as **Exhibit 6**).

³ ANA's company contact information related to Mr. O'Hara can be found at: <https://www.ana.net/content/show/id/contact>

7. A video produced by Counterclaim-Defendants this week of a Project Veritas Board Meeting on March 22, 2023, in which Thomas O'Hara attended (attendee "tohara" in the screenshot below) also matches the profile picture in the LinkedIn profile linked above.



8. The email at ECF No. 178-7 and attached as **Exhibit 7** to this Declaration is a true and correct copy of an email to Thomas O'Hara on June 10, 2025, to the personal email on Mr. O'Hara's resume obtained through discovery. Mr. O'Hara has not yet responded to the attached email, but my office did not receive a message that the email was undeliverable either.

9. If authorized by this Court, I intend to use the email addresses on Mr. O'Hara's resume and ANA's website for personal service because email addresses on a resume and those listed on a current employer's website are sufficiently reliable and we did not receive an undeliverable email response to the June 10, 2025, email to Mr. O'Hara.

10. If authorized, I also intend to use LinkedIn messaging available in connection with the profile in paragraph 4 to serve Mr. O'Hara because of the profile picture and information matching that of the former Chief Financial Officer of Project Veritas.

11. If authorized, I also intend to serve Mr. O'Hara via certified mail at his Pawling, New York property, given that the Dutchess County property records and Mr. O'Hara's LinkedIn profile corroborate that the Pawling residence belongs to Mr. O'Hara.

12. If authorized, I also intend to serve Mr. O'Hara via certified mail at his current place of employment, ANA.

13. In summary, multiple attempts were made to serve Mr. O'Hara in Bear, Delaware in the fall of 2024, but we lost contact with the process server and an Affidavit of Non-Service was not provided. Three attempts were made to serve Mr. O'Hara in Bear, Delaware in April 2025 (Exhibit 1). Three additional attempts were made to serve Mr. O'Hara at his Pawling, New York address in June 2025 (Exhibit 4). Two final attempts were made to serve Mr. O'Hara at a New York City business address in June 2025 (Exhibit 6). My office also emailed Mr. O'Hara regarding accepting service of a Subpoena for deposition on June 10, 2025 (Exhibit 7). My office has attempted to serve Mr. O'Hara at least nine (9) times at three (3) addresses and one email address.

14. I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 2, 2025.

A handwritten signature in black ink, appearing to read "Nicholas P. Whitney", is written over a horizontal line.

Nicholas P. Whitney

Exhibit 1

AFFIDAVIT OF SERVICE
UNITED STATES DISTRICT COURT
District of New York

Index Number: CIVIL ACTION NO.
7:23-CV-04533

Date Filed: _____

Plaintiff: **Project Veritas & Project Veritas Action Fund**
vs.
Defendant: **James O'Keefe, et al.**



For: Childers Law, LLC

Received by Delaware Detective Group, LLC on the 22nd day of April, 2025 at 12:08 pm to be served on **THOMAS O'HARA, [REDACTED] BEAR, DE 19701-2042**, being duly sworn, depose and say that on the _____ day of _____, 20____ at _____:____.m., executed service by delivering a true copy of the **SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION WITH ATTACHMENT "A" TO SUBPOENA TO THOMAS O'HARA WITH ATTACHED WITNESS FEE CHECK IN THE AMOUNT OF \$4.24** in accordance with state statutes in the manner marked below:

() INDIVIDUAL SERVICE: Served the within-named person.

() SUBSTITUTE SERVICE: By serving _____ as _____.

() POSTED SERVICE: After attempting service on ____/____/____ at _____ and on ____/____/____ at _____ to a conspicuous place on the property described herein.

☒ **NON SERVICE:** For the reason detailed in the Comments below.

Military Status: () Yes or () No If yes, what branch? _____

Marital Status: () Married or () Single Name of Spouse _____

COMMENTS: *I made numerous attempts which were met with no answer*
4/7/25 @ 12:10pm - no answer
4/24/25 @ 8:50am - no answer
4/24/25 @ 5:10pm - no answer

Age _____ Gender M F Race _____ Height _____ Weight _____ Hair _____
Glasses Y N

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and Sworn to before me on the _____ day of _____, 20____ by the affiant who is personally known to me.

NOTARY PUBLIC



PROCESS SERVER # 0958A
Appointed in accordance with State Statutes

Gleason Investigations
250 Palm Coast Parkway NE
Suite #607-194
Palm Coast, FL 32137
(386) 627-8222

Our Job Serial Number: 2025003606

Exhibit 2

From: Matthew Tyrmand <mtyrmand@[REDACTED]>
Sent: Wednesday, September 13, 2023 6:42 PM EDT
To: Matthew Tyrmand <mtyrmand@[REDACTED]>
BCC: jkgarvey@[REDACTED] <[REDACTED]>
Subject: Fwd: PV Former Team Resumes (23)
Attachment(s): "Jonat [REDACTED].pdf", "Tom O'Hara Resume 2023.pdf", [REDACTED].pdf"

Hi All:

With the ongoing demise of Project Veritas- which does not need to be litigated in this space as I am sure it will be litigated by many others soon- there is a plethora of journalistic and conservative movement talent hitting the market. I have compiled resumes together of those I have worked with that are superlative in their skills, dedication, ethics, and all around value add that I know would do amazing things with and for your respective organizations. I urge you to take a look at their resumes and distribute them widely and I am of course available to answer questions about individual candidates, those that might work well together, skill sets, and those that might fill gaps in your respective orgs.

Thanks,
Matt

----- Forwarded message -----

From: Matthew Tyrmand [REDACTED]
Date: Mon, Sep 11, 2023 at 11:42 PM
Subject: PV Former Team Resumes (23)
To: Matthew Tyrmand [REDACTED]

[REDACTED]
[REDACTED] / Tom O'Hara / [REDACTED]

--
Matt Tyrmand
[REDACTED]

Exhibit 3

THOMAS O'HARA

██████████ ♦ Pawling, NY 12564 ♦ ██████████ ♦ tomohara ██████████

CFO / VP FINANCE & OPERATIONS

A Senior Operational Finance Executive with 25+ years' experience leading business and finance operations (Sales, Human Resources and Accounting/Finance) in companies ranging in size from \$10M to \$750M+. Tom builds enterprise value by generating growth to the top and bottom lines of companies by assessing risk & opportunities, developing a collaborative fiscally responsible plan and executing upon it. Tom is a communicator and exceptional at breaking down strategic initiatives into tactical steps to generate cost-effective solutions that yield positive results for companies. Tom has a keen ability to leverage resources and alliances to maximize performance and value across large and mid-sized organizations. Tom is particularly effective in reorganizing, streamlining, and strengthening business operations and processes to meet critical business needs.

EXECUTIVE LEADERSHIP COMPETENCIES

- Business Operations Leadership
- Performance Metrics Management
- Financial Operations Leadership
- Strategic & Tactical Initiatives
- Leveraging Strategic Partnerships
- P&L Management & Forecasting
- Team Development
- Technology Deployment
- Communication Strategies

PROFESSIONAL EXPERIENCE

WRNN TV / Verizon FiOS1 News, Westchester, NY Chief Financial Officer

2014 – Present

News content producer that program three 24/7 news channels and multiple broadcast television stations in three of the top ten DMA's in the United States.

Oversee all aspects of Finance / Accounting, Sales and Human Resources for the company. Supervise preparation of year-end tax return requests, all audit requests, statutory reporting for broadcast channels (EEO, Must Carry elections, etc...). Lead the tax planning for company with outside accounting firm and impact to partners' personal returns. Prepared quarterly distribution to partners based on equity ownership of various operating and holding companies. Lead benefit renewal negotiation with insurance carrier / broker for health / dental and ancillary benefits. Negotiate all corporate insurance renewals (E&O, Media, General Liability, Commercial Package, Auto, etc...). Create monthly management reports with explanations of variance to budget, forecast the balance of the year, and highlight risks & opportunities for P&L and cash flow.

Selected Achievements

- Successfully integrated two new broadcast asset acquisitions into existing company infrastructure.
- Successfully negotiated health /dental and ancillary benefit renewal while keeping rates flat to the employee for two consecutive years.
- Reduced monthly management reporting timeline from ten business days to seven business days with expanded variance analysis on sales and operating expenses by operating entity.
- Reduced DSO by an average of 15 days with improved communication between customer base and RNN Accounting Department.

██████████ ♦ Pawling NY 12564 ♦ ██████████ ♦ tomohara ██████████

Virgil Films & Entertainment, New York, NY**2007 – 2014****Chief Financial Officer***International Home Entertainment distributor with 8+ employees and annual revenues exceeding \$10 million.*

Oversee all financial aspects of the company including co-operational oversight with the President of VFE. Led the restructuring of the operations, sales and marketing departments to better utilize existing employee skill sets and improve workflow and reporting. Directed and trained four direct reports. Developed and established budgets for company inclusive of sales, overhead and discretionary marketing. Evaluated and renegotiated existing vendor contracts for more favourable terms leading to improved cash flow and operational results. Created ad hoc reporting to identify industry trends for use in strategic planning and contract negotiations.

Selected Achievements

- Took in house all billing and collection functions, previously paid to third party vendors saving company 8% - 18% of net revenue with no additional overhead expense.
- Reduced overhead expense by 30% annually through restructuring workflow and outsourcing of some in house functions. Standard deal terms allow to recoup third party cost as opposed to overhead cost.
- Reduced discretionary marketing spend to be 14% of net revenue as opposed to historical rate of 18% -20% of gross sales (\$0.5M annual savings). Through establishing an open, regular line of communication directly with the EVP of sales, I was better able to anticipate net sales figure prior to commitment of marketing dollars. As net sales forecast changed based on latest market data collected from the sales team, marketing budgets were adjusted. Changed company philosophy to pursuing more non-traditional, less expensive forms of marketing.

Reduced budget / forecast variances by establishing and facilitating weekly conference calls to ensure annual budgets and forecasts were accurate and to review general industry trends for identifying and capturing potential strategic opportunities to expand and grow business operations.

Rainbow Media Holding LLC (Cablevision / Altice), Jericho, NY**2006 – 2007****Vice President – Strategic Planning & Operations***International cable channel operator with 500+ employees and annual revenues exceeding \$1 billion.*

Led affiliate sales and marketing operations in finance and contract management to support AMC, WE, IFC, and VOD entities. Directed and trained six direct reports. Developed and managed marketing and sales budgets for cable channels. Streamlined ad hoc reporting processes to identify industry and operator trends for use in strategic planning and contract negotiations.

Selected Achievements

- Averted reporting loss of \$425 million in potential revenue by revising existing revenue forecasts to capture accurate market data used for contract negotiations.
- Improved closing times 51%+ by implementing a communication strategy to foster and promote the accurate and timely reporting of a \$20.4 million operating budget and \$425 million in revenue forecast for various operating units.
- Reduced budget / forecast variances up to 67% by establishing and facilitating open discussions with regional heads of sales and marketing to ensure annual budgets and forecasts were accurate and complete.

Established monthly staff meetings for direct reports and their staff to review general industry trends for identifying and capturing potential strategic opportunities to expand and grow business operations.

Geller & Company (Bloomberg LP), New York, NY**2005 – 2006****Operations Consultant***Outsource provider of accounting & finance services with 125 employees+ and annual revenue exceeding \$100 million.*

Provided technical consulting and leadership to support the execution of complex business solutions for a large Fortune 500 company (Bloomberg LP). Oversaw four direct reports. Implemented new non-financial-based management reports to support client operations. Prepared business cases with recommendations to senior management for changing current

Thomas O'Hara Professional Experience... continued

Page 3 of 3

methodologies that included processes for tracking customer sales and identifying financial impacts throughout the product sales lifecycle. Reconciled data sales process and billing with internal systems.

Selected Achievements

- Preserved up to \$210 million in data sales and increased productivity throughout client operations by documenting and communicating an entire sales process to enhance employee learning curves throughout business operations.
- Improved performance reporting 15% by leading project to develop, implement, and improve processes for generating accurate, automated performance metrics to support business decision-making functions.

Vivendi Universal Entertainment / USA Cable

2000 – 2005

Vice President of Finance & Business Operations

Domestic cable channel operator with 450+ employees and \$1 billion in annual revenue.

Selected to lead finance and accounting operations with overall accountability for financial reporting and analysis (income statement, balance sheet, cash flow), payroll, budget and forecast preparation, internal accounting / finance controls, investment activities, and coordination of all process improvement initiatives for the finance organization. Supervised eight direct reports. Reviewed and approved all month-end account reconciliations. Collaborated with NBC and GE integration teams to define processes and select best practices, revenue, and cost synergy targets for the business. Ensured Sarbanes-Oxley compliance.

Selected Achievements

- \$3 million in cost savings generated by successfully negotiating lower rates with vendors to effectively aggregate and manage entire company spend while accommodating low-volume business.
- Gained \$1.2 million in annual profit by working closely with Ad Sales to modify compensation package based on creating a minimum pricing floor for cash sales, resulting in increased sales performance.
- \$3 million secured in net revenue growth by negotiating the exchange of promotional ad time for advertising marketing programs between ad sales and marketing departments.
- Reduced DSO 40% by developing and implementing a sales tool kit to provide sales team critical sales reports to help measure and improve DSO performance.
- Estimated synergy and growth targets up to \$500 million for a \$14 billion business by leading a due diligence process to review and analyse target financials for accuracy as basis for assessing equity value.
- Planned and coordinated monthly financial review meetings to identify and evaluate risks and opportunities, providing senior management ability to respond to changing market conditions.

Collaborated with ad sales team and programming department to develop new software applications for managing more than \$1 billion in programming assets and up to \$30 million in ad sales liability.

International Management Group (IMG / TWI), New York, NY

1991 – 2000

Staff Accountant to Vice President of Finance

Largest worldwide independent producer of television programming with offices in 18 countries and annual revenues exceeding \$750 million.

Oversaw accounting and finance operations with oversight for global television income projections, cash flow, and a tax projection system handling \$500M+ in sales per year. Supervised six direct reports. Managed finances for a broadcasting division with \$50M+ in annual revenue. Led a U.S. television production business with \$40M+ in annual revenue. Oversaw billing, receivables, and payables as well as month-end accounting closes. Increased operating margin 4% internationally and 3% domestically by aligning assets to maximize ROI. Launched more reliable financial SAP software system, generating 40% reduction in maintenance costs and 66% increase in reporting efficiencies.

EDUCATION / CERTIFICATIONS

- **M.B.A. – International Finance**, Fordham University, New York, NY
- **B.S. in Finance, Minor in Accounting**, City University of New York / Baruch College, New York, NY
- **Green Belt Six Sigma Certification**

Exhibit 4

AFFIDAVIT OF SERVICE
UNITED STATES DISTRICT COURT
District of New York

Index Number: CIVIL ACTION NO.
7:23-CV-04533

Date Filed: _____

Plaintiff: **Project Veritas & Project Veritas Action Fund**
vs.
Defendant: **James O'Keefe, et al.**



For: Childers Law, LLC

Received by Gleason Investigations on the 15th day of May, 2025 at 10:51 am to be served on **THOMAS O'HARA, [REDACTED] PAWLING, NY 12564** I, Gary DiPaolo, being duly sworn, depose and say that on the _____ day of _____, 20____ at ____:____.m., executed service by delivering a true copy of the **SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION WITH ATTACHMENT "A" TO SUBPOENA TO THOMAS O'HARA** in accordance with state statutes in the manner marked below:

() INDIVIDUAL SERVICE: Served the within-named person.

() SUBSTITUTE SERVICE: By serving _____ as _____.

() POSTED SERVICE: After attempting service on ____/____ at _____ and on ____/____ at _____ to a conspicuous place on the property described herein.

☒ NON SERVICE: For the reason detailed in the Comments below.

Military Status: () Yes or () No If yes, what branch? _____

Marital Status: () Married or () Single Name of Spouse _____

COMMENTS: Attempted May 20th at 10:15 AM
May 27th at 6:22 pm and June 2nd at 4:43pm
No contact

Age ____ Gender M F Race _____ Height _____ Weight _____ Hair _____
Glasses Y N

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and Sworn to before me on the 10th
day of JUNE, 2025 by the affiant who
is personally known to me.

Amanda DiPaolo
NOTARY PUBLIC

AMANDA DIPAOLO
NOTARY PUBLIC-STATE OF NEW YORK
No. 01DI6367475
Qualified in Putnam County
My Commission Expires 11-20-2025

[Signature]
PROCESS SERVER # _____
Appointed in accordance with State Statutes

Gleason Investigations
250 Palm Coast Parkway NE
Suite #607-194
Palm Coast, FL 32137
(386) 387-0595

Our Job Serial Number: 2025004373

Exhibit 5



ParcelAccess | Property Details

FINAL ROLL

Parcel Number

134089-6955-00-537772-0000

Parcel Location**Municipality**

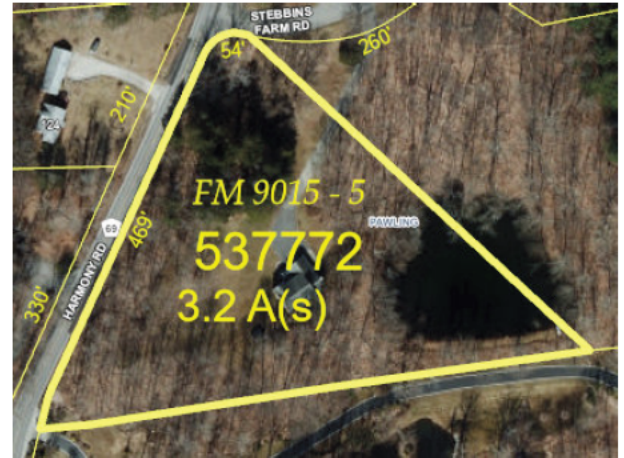
Pawling

Owner Name

O'Hara, Thomas (Primary)

Primary Owner Mailing Address

Pawling, NY 12564



Parcel Details

Lot Size (acres):	3.208 Ac (S)	Split Town:	-
Filed Map:	9015	Agri. District:	None
File Lot #:	5	School District:	(134001) Pawling CSD
Land Use Class:	(210) 1 Family Res		

Assessment Information (Current)

Land:	Total:	County Taxable:	Town Taxable:	School Taxable:	Village Taxable:
\$31,700	\$198,100	\$198,100	\$198,100	\$198,100	\$0
Tax Code:	Roll Section:	Uniform %:	Full Market Value:		
-	1 (Taxable)	29.61	\$669,000		
Tentative Roll:	Final Roll:	Valuation Date:			
5/1/2025	7/1/2025	7/1/2024			

Last Sale / Transfer

Sale Price:	Sale Date:	Deed Book:	Deed Page:	Sale Condition:	No. Parcels:
-	-	22001	05580	-	-

Site Information

Site 1

Water Supply:	Sewer Type:	Desirability:	Zoning Code: *	Used As:
(2) Private	(2) Private	(3) Superior	R-3	-

Residential Building Information

Site 1

Year Built:	Year Remodeled:	Building Style:	No. Stories:	SFLA:	Overall Condition:
1996	-	(06) Contemporary	2	2,306	(3) Normal
No. Bedrooms:	No. Full Baths:	No. Half Baths:	No. Kitchens:	No. Fireplaces:	Basement Type:
4	2	1	1	1	(4) Full
Central Air:	Heat Type:	Fuel Type:	First Story:	Second Story:	Additional Story:

No	(3) Hot wtr/stm	(4) Oil	1,233	1,073	0
Half Story:	3/4 Story:	Fin. Over Garage:	Fin. Attic:	Unfin. Half Story:	Unfin. 3/4 Story:
0	0	0	0	0	0
Fin. Basement:	Fin. Rec Room:	No. Rooms:	Grade:	Grade Adj. Pct.:	
0	0	0	(B) Good	100	

Improvements

Site 1, Improvement 1

Structure Code:	Dim. 1:	Dim. 2:	Quantity:
(RP2) Porch-coverd	0	0	1
Year Built:	Condition:	Grade:	Sq. Ft.:
1996	(3) Normal	B	61

Site 1, Improvement 2

Structure Code:	Dim. 1:	Dim. 2:	Quantity:
(RP1) Porch-open/deck	0	0	1
Year Built:	Condition:	Grade:	Sq. Ft.:
1996	(3) Normal	C	224

Site 1, Improvement 3

Structure Code:	Dim. 1:	Dim. 2:	Quantity:
(RG1) Gar-1.0 att	0	0	1
Year Built:	Condition:	Grade:	Sq. Ft.:
1996	(3) Normal	C	484

Site 1, Improvement 4

Structure Code:	Dim. 1:	Dim. 2:	Quantity:
(RG1) Gar-1.0 att	0	0	1
Year Built:	Condition:	Grade:	Sq. Ft.:
1996	(3) Normal	B	484

Site 1, Improvement 5

Structure Code:	Dim. 1:	Dim. 2:	Quantity:
(RP1) Porch-open/deck	0	0	1
Year Built:	Condition:	Grade:	Sq. Ft.:
1997	(3) Normal	C	300

Special District Information

Special District: PF021

Special District Name:	Primary Units:	Ad Valorem Value:
Pawling Fire Prot	0	\$198,100

ABSOLUTELY NO ACCURACY OR COMPLETENESS GUARANTEE IS IMPLIED OR INTENDED. ALL INFORMATION ON THIS MAP IS SUBJECT TO CHANGE BASED ON A COMPLETE TITLE SEARCH OR FIELD SURVEY.

*Please see the Dutchess County Zoning Map for the most up-to-date zoning information.

This report was produced using ParcelAccess on 7/1/2025. Developed and maintained by OCIS - Dutchess County, NY.

Exhibit 6

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT
OF NEW YORK

AFFIRMATION OF DUE DILIGENCE



19887

Index no : 7:23-CV-04533

Plaintiff(s):	PROJECT VERITAS & PROJECT VERITAS ACTION FUND
vs.	
Defendant(s):	JAMES O'KEEFE, et al.

Roberto Urena, affirms deponent is not a party to this action, over the age of eighteen years and resides in the state of New York.

On **06/24/2025 at 12:50 PM**, I discontinued attempting service of the **SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION WITH ATTACHMENT "A" TO SUBPOENA TO THOMAS O'HARA** with the index# **7:23-CV-04533** endorsed thereon on **THOMAS O'HARA** [REDACTED] [REDACTED] Assoc of National Advisors for the reason(s) indicated below:

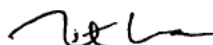
Date/Time

06/20/2025 at 9:54 AM

06/24/2025 at 12:50 PM

Comments: Address attempted : [REDACTED] Street New York, NY 1017 6-20 @ 9:54 AM, Ray the concierge stated that Company usually works remote Fridays and Mondays Called up and received no answer, Checked his directory and did not find Thomas O'hara listed. Access to Premises was refused. 6-24 @ 12:50 PM, Ray , the concierge called company, and received No answer, Access to Premises was refused.

I affirm this 25th day of June, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

X 
Roberto Urena
License#: 1263889
Benchmark Services LLC
95-22 63rd Road
Suite #428
Rego Park, NY 11374
718-350-4319
License#: 2037568-DCA

Notary Not Required Pursuant To N.Y. CPLR 2106

GLEASON INVESTIGATIONS

Exhibit 7

Service of Subpoena for Deposition - Project Veritas, et al. v. O'Keffe, et al.

From: angela.masciulli@smartbizlaw.com <angela.masciulli@smartbizlaw.com>

Sent: Tue, Jun 10, 2025 at 3:47 pm

To: tomohara [REDACTED]

Cc: Nick Whitney

[20250508 Subpoena Duces Tecum with Deposition Tom O'Hara \(06 26 2025\).pdf](#) (606.5 KB)

Good afternoon, Mr. O'Hara,

Our office represents James O'Keffe and O'Keffe Media Group in the matter of Project Veritas, et al. v. O'Keffe, et al. pending in the Southern District of New York. We have attempted to personally serve you with the attached Subpoena to Testify in a Civil Matter. Would you be willing to accept service of the Subpoena via email or can you verify that [REDACTED] Pawling, NY 12564 is still a valid address for personal service?

Regards,

Angela

Contact Information

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